

# **EXHIBIT A**

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**FELDMAN  
SHEPHERD  
WOHLGELERNTER  
TANNER  
WEINSTOCK  
DODIG LLP**

John M. Dodig  
Shareholder  
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Also Member of NJ Bar  
LL.M In Trial Advocacy; Certified By The  
Supreme Court Of New Jersey As A Civil Trial  
Attorney

February 6, 2019

Double G Logistics, Inc.  
6974 Kennedy Road  
Trinity, NC 27370

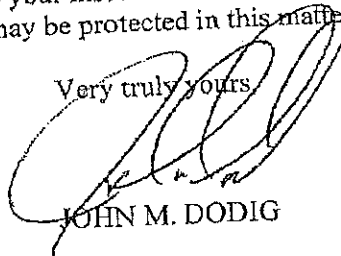
**RE: Kathleen Harris, et al v. Robert Sullivan, et al  
Court of Common Pleas, Philadelphia County  
February Term, 2018 – No. 000325**

Gentlemen:

Enclosed please find the Civil Action Complaint with regard to the above matter. Please note you have twenty (20) days in which to file an Answer and/or Entry of Appearance or a judgment in default may be filed against you.

I suggest that you forward this to your insurance carrier, or attorney if you do not have an insurance carrier, so that your interests may be protected in this matter.

Very truly yours,



JOHN M. DODIG

JMD/kv

**SENT VIA CERTIFIED MAIL**

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Court of Common Pleas of Philadelphia County  
Trial Division  
**Civil Cover Sheet**

PLAINTIFF'S NAME  
KATHLEEN HARRIS

PLAINTIFF'S ADDRESS  
618 EDGEWATER DRIVE  
WEST CHESTER PA 19380

PLAINTIFF'S NAME  
MARK HARRIS

PLAINTIFF'S ADDRESS  
618 EDGEWATER DRIVE  
WEST CHESTER PA 19380

PLAINTIFF'S NAME

PLAINTIFF'S ADDRESS

For Prothonotary Use Only (Docket Number)  
**FEBRUARY 2019**  
Filing Number: 1902011000 **000325**

DEFENDANT'S NAME  
ROBERT SULLIVAN

DEFENDANT'S ADDRESS  
4132 SKYVIEW COURT  
TRINITY SC 27370

DEFENDANT'S NAME  
DOUBLE G LOGISTICS, INC.

DEFENDANT'S ADDRESS  
6974 KENNEDY ROAD  
TRINITY SC 27370

DEFENDANT'S NAME

DEFENDANT'S ADDRESS

TOTAL NUMBER OF PLAINTIFFS

2

TOTAL NUMBER OF DEFENDANTS

2

COMMENCEMENT OF ACTION

☒ Complaint

☐ Writ of Summons

☐ Petition Action

☐ Transfer From Other Jurisdictions

☐ Notice of Appeal

AMOUNT IN CONTROVERSY

☐ \$50,000.00 or less

☒ More than \$50,000.00

COURT PROGRAMS

☐ Arbitration

☒ Jury

☐ Non-Jury

☐ Other

☐ Mass Tort

☐ Savings Action

☐ Pension

☐ Commerce

☐ Minor Court Appeal

☐ Statutory Appeals

☐ Settlement

☐ Minors

☐ W/D/Survival

CASE TYPE AND CODE

2V - MOTOR VEHICLE ACCIDENT

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED  
PRO PROTHY**

**FEB 06 2019**

**M. BRYANT**

IS CASE SUBJECT TO  
COORDINATION ORDER?  
YES NO

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: KATHLEEN HARRIS , MARK HARRIS

Papers may be served at the address set forth below.

NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY

JOHN M. DODIG

PHONE NUMBER

(215) 567-8300

FAX NUMBER

(215) 567-8333

SUPREME COURT IDENTIFICATION NO.

51092

SIGNATURE OF FILING ATTORNEY OR PARTY

JOHN DODIG

ADDRESS

1845 WALNUT STREET  
21ST FLOOR  
PHILADELPHIA PA 19103

E-MAIL ADDRESS

jdodig@feldmanshepherd.com

DATE SUBMITTED

Wednesday, February 06, 2019, 10:41 am

FINAL COPY (Approved by the Prothonotary Clerk)

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Feldman, Shepherd, Wohlgelemer  
 Tanner, Weinstock & Dodig  
 By: John M. Dodig, Esquire/Jason A. Daria, Esquire  
 I.D. No. 51092/73360  
 1845 Walnut Street  
 21st Floor  
 Philadelphia, PA 19103  
 (215) 567-8300

Filed and Accepted by the  
 Office of Judicial Records  
 06 FEB 2019 10:41 am

Attorneys for Plaintiff(s)

KATHLEEN HARRIS  
 618 Edgewater Drive  
 West Chester, PA 19380

And

MARK HARRIS  
 618 Edgewater Drive  
 West Chester, PA 19380

v.

Robert Sullivan  
 4132 Skyview Court  
 Trinity, NC 27370

And

DOUBLE G LOGISTICS, INC.  
 6974 Kennedy Road  
 Trinity, NC 27370

COURT OF COMMON PLEAS  
 PHILADELPHIA COUNTY

## NOTICE TO PLEAD

## NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defense or objections to the claim set forth against you.

You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP

LAWYER REFERENCE SERVICE

## AVISO

Le han demandado a usted en la corte. Si desea defenderse contra los cujas presentadas, es absolutamente necesario que usted responda dentro de 20 días después de ser servido con esta demanda y aviso. Para defenderse es necesario que usted, o su abogado, registre con la corte en forma escrita, el punto de vista de usted y cualquier objeción contra las cujas en esta demanda.

Requiere: Si usted no responde a esta demanda, se puede proseguir con el proceso sin su participación. Entonces, la corte puede, sin notificarlo decidir a favor del demandante y requerir que usted cumpla con todas las provisiones de esta demanda. Por razón de esa decisión, es posible que usted pueda perder dinero, propiedad o otros derechos importantes. \*LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA, LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CON SEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL  
 ONE READING CENTER  
 1101 MARKET STREET  
 PHILADELPHIA, PA 19107  
 (215) 238-1701

Case ID: 190200325

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ONE READING CENTER  
PHILADELPHIA, PA 19107  
(215) 238-1701

Case ID: 190200325

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Feldman, Shepherd, Wohlgeleinter  
Tanner, Weinstock & Dodig  
By: John M. Dodig, Esquire/Jason A. Daria, Esquire  
I.D. No. 51092/73360  
1845 Walnut Street  
21st Floor  
Philadelphia, PA 19103  
(215) 567-8300

Attorneys for Plaintiff(s)

KATHLEEN HARRIS  
618 Edgewater Drive  
West Chester, PA 19380  
And

MARK HARRIS  
618 Edgewater Drive  
West Chester, PA 19380

v.

Robert Sullivan  
4132 Skyview Court  
Trinity, NC 27370  
And

DOUBLE G LOGISTICS, INC.  
6974 Kennedy Road  
Trinity, NC 27370

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

**COMPLAINT - CIVIL ACTION**

**COUNT I**

**KATHLEEN HARRIS V. DEFENDANTS**

1. Plaintiff, Kathleen Harris, is an adult individual who resides at 618 Edgewater Drive, West Chester, Pennsylvania 19380.
2. Plaintiff, Mark Harris, is an adult individual who resides at 618 Edgewater Drive, West Chester, Pennsylvania 19380.
3. Defendant, Robert Sullivan, is an adult individual who resides at 4132

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Skyview Court, Trinity, North Carolina 27370.

4. Defendant, Double G Logistics, Inc., is a corporation and/or business entity with a principal place of business located at 6974 Kennedy Road, Trinity, North Carolina 27370.

5. At all times relevant hereto, Defendant, Robert Sullivan, was an employee and actual or apparent agent of the Defendant, Double G Logistics, Inc., and was acting in the course and scope of his employment and agency with the Defendant, Double G Logistics, Inc.

6. At all relevant times, Defendant, Double G Logistics, Inc., regularly conducted and continues to regularly conduct business in the Commonwealth of Pennsylvania and Philadelphia County, Pennsylvania.

7. On February 25, 2017, at approximately 10:55 a.m., Plaintiff, Kathleen Harris, was a passenger in a motor vehicle being operated by the Plaintiff, Mark Harris, traveling north on Route 100 in West Whitehall Township, Chester County, Pennsylvania when Plaintiffs' vehicle was struck in the rear by the tractor trailer being operated by the Defendant, Robert Sullivan, and owned by the Defendants, Double G Logistics, Inc., causing Plaintiff to sustain serious and permanent personal injuries more specifically set forth below.

8. At the time of the accident, Defendant, Robert Sullivan, was employed by the Defendant, Double G Logistics, Inc. Upon information and belief, Defendant, Robert Sullivan, was acting in the course and scope of his employment at the time of the accident.

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9. The accident as aforesaid was caused by the negligence of the Defendants and was in no manner whatsoever due to any act or failure to act on the part of the Plaintiffs.

10. The carelessness, recklessness and negligence of the Defendants included the following:

- a. Operating the said motor vehicle at a high and excessive rate of speed under the circumstances;
- b. Failure to keep a proper lookout ahead;
- c. Failure to have said motor vehicle under such control as to be able to stop within the assured clear distance ahead;
- d. Failure to make proper observations of traffic upon the roadway;
- e. Failure to properly use the brakes;
- f. Being otherwise negligent under the circumstances;
- g. Operating a motor vehicle in careless disregard for the safety of persons or property in violation of 75 Pa.C.S.A. §3714; and
- h. Careless and reckless driving.

11. As a direct and proximate result of the negligence of the Defendants as aforesaid, Plaintiff, Kathleen Harris, sustained a concussion with loss of consciousness, laceration to the upper lip, nasal fracture, neck pain and headaches, as well as damage to her nerves and nervous system.

12. All of the aforesaid injuries are permanent and have imposed a serious impairment of a body function upon the Plaintiff and have caused, and in the future will cause the Plaintiff great pain and suffering and a serious impairment of a bodily function.



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13. As a further result of this accident and by reason of the injuries sustained, Plaintiff has in the past been obligated to receive and undergo medical attention and care and to expend various sums of money and/or incur various expenses for the injuries she has suffered, and she may in the future continue to be obliged to expend such sums or to incur such expenses.

14. As a further result of this accident and by reason of the injuries suffered, Plaintiff has in the past suffered and may in the future continue to suffer great pain, agony, mental anguish, embarrassment and humiliation, and has in the past been hindered and may in the future continue to be hindered from attending to her daily duties, functions and occupation, to her great detriment and loss.

15. As a further direct and proximate result of the negligence of the Defendants, Plaintiff has suffered injuries which have caused her physical and mental impairment, preventing her from performing all or substantially all of the material acts and duties which constitute her usual and customary daily activities, constituting a loss of the enjoyment of the ordinary pleasures of life.

16. As a further result of this accident and by reason of the injuries sustained, Plaintiff has sustained an impairment of her earning capacity and power.

17. The negligence of the Defendants as stated herein was the proximate cause or a substantial factor in causing the injuries and damages sustained by the Plaintiff.

WHEREFORE, Plaintiff, Kathleen Harris, demands judgment against the Defendants in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest and costs.

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**COUNT II**  
**MARK HARRIS V. DEFENDANTS**

18. Plaintiff incorporates by reference all preceding paragraphs as though fully set forth herein.

19. Plaintiff, Mark Harris, is the husband of Plaintiff, Kathleen Harris.

20. As a result of Defendants' negligence and carelessness, as set forth above, Plaintiff, Mark Harris, has been deprived of his wife's consortium, care, services, comfort, society, affection and support.

WHEREFORE, Plaintiff, Mark Harris, demands judgment against the Defendants in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with interest and costs.

Feldman, Shepherd, Wohlgeferner,  
Tanner, Weinstock & Dodig

By \_\_\_\_\_

JOHN M. DODIG, ESQUIRE  
JASON A. DARIA, ESQUIRE  
Attorneys for Plaintiffs

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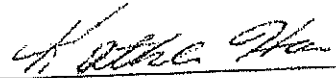
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## VERIFICATION

I, Kathleen Harris, hereby state that I am one of the Plaintiffs in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



---

Kathleen HarrisDate: 1.23.18

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### VERIFICATION

I, Mark Harris, hereby state that I am one of the Plaintiffs in this action and verify that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Date: 1/23/18

  
\_\_\_\_\_  
Mark Harris